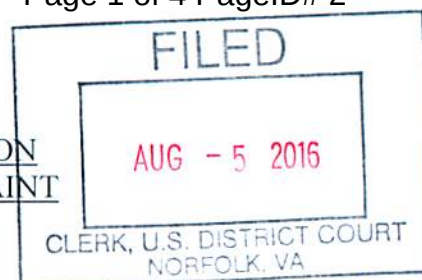


AFFIDAVIT IN SUPPORT OF APPLICATION
FOR ISSUANCE OF A CRIMINAL COMPLAINT



I, Harald S. Julsrud III, being first duly sworn state:

1. I am a Special Agent of the Department of Homeland Security, Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI), currently assigned to the Office of the Assistant Special Agent in Charge (ASAC), Norfolk, Virginia. Your affiant has been so employed since December 2007. As part of my daily duties as an HSI agent, I investigate criminal violations relating to child exploitation and child pornography including violations pertaining to the illegal production, distribution, receipt, and possession of child exploitation material, in violation of 18 U.S.C. §§ 2251, 2252 and 2252A. I have received training in the area of child pornography and child exploitation at the Federal Law Enforcement Training Center, the HSI Cyber Crimes Center, conferences related to the aforementioned subject matter, and everyday work relating to conducting these types of investigations, and have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256(8)) in all forms of media including computer media. Your Affiant is currently assigned to HSI Norfolk Homeland Security and Child Exploitation Group. Since 2010, your affiant has also been a Computer Forensics Agent with HSI, and as part of my duties, your affiant has supported numerous criminal investigations related to child exploitation.

2. Your affiant has assisted in the investigation of the offenses described in this affidavit. As a result of your affiant's participation in this investigation and a review of reports made by other law enforcement officers, your affiant is familiar with the circumstances of this on-going investigation. I have not included each and every fact known to me in this affidavit, but only the facts I believe are necessary to establish probable cause to believe Bruce Lee SCOTT has engaged in the crimes of receipt and possession of child pornography, in violation of 18 U.S.C. §§ 2252A(a)(2)(B) and (5)(B).

LEGAL AUTHORITY

3. Title 18, United States Code, Section 2252A(a)(2)(B) provides, in pertinent part, any person who knowingly receives or distributes any child pornography using any means or facility of interstate or foreign commerce or that has been mailed, or has been shipped or transported in or affecting interstate or foreign commerce, or which contains materials which have been mailed or so shipped or transported, by any means, shall be punished not less than five years and not more than twenty years.

4. Title 18, United States Code, Section 2252A(a)(5)(B) prohibits a person from knowingly possessing, or knowingly accessing with intent to view, one or more books, magazines, periodicals, films, or other materials which contain child pornography that have been mailed, shipped or transported using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce, or which was produced using materials which have been mailed, shipped or transported, by any means including by computer. In pertinent part, "child pornography," as defined in 18 U.S.C. § 2256, means any visual depiction, including any photograph, film, video, picture where the production of such visual depiction involves the use of a minor engaged in sexually explicit conduct. Sexually explicit conduct is defined as graphic sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal, whether

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between persons of the same or opposite sex, or lascivious simulated sexual intercourse where the genitals, breast, or pubic area of any person is exhibited, or graphic or simulated lascivious exhibition of the genitals or pubic area of any person.

PROBABLE CAUSE TO ARREST BRUCE LEE SCOTT

5. Between November 30, 2015, and December 09, 2015, a Federal Law Enforcement Officer utilized a modified version of the ARES P2P file-sharing application to complete five (05) single-source downloads (downloads in which the entire file is downloaded from a single user) of video files depicting scenes of Child Exploitation / Child Abuse. The P2P file-sharing application reported the IP Address that this user was utilizing at the time these downloads occurred as 108.39.125.218. A query for the IP Address 108.39.125.218 was conducted through the American Registry for Internet Numbers (ARIN) was conducted, and information was received that the aforementioned IP Address was registered to Verizon Online LLC. On December 22, 2015, U.S. Department of Justice / Federal Bureau of Investigations Subpoena number 177607 was served to Verizon Online requesting subscriber information for the billing cycle including the time period of December 16, 2015, through December 18, 2015, for IP Address 108.39.125.218. On January 05, 2016, Verizon Online responded to the aforementioned subpoena indicating that for the billing cycle covering November 18, 2015, through December 18, 2015, IP Address 108.39.125.218 was assigned to the following subscriber:

Jessica Scott
932 Joshua Drive
Virginia Beach, VA 23462

6. Your affiant has reviewed the aforementioned video files, and I have determined that they contain scenes of children engaged in sexually explicit conduct. Specifically, five video files were downloaded from IP Address 108.39.125.218, and are described as follows:

a. On November 30, 2015, between 0948 and 0954 hours, two video files were downloaded from the IP Address mentioned above. The first is a video file titled "11(2).mpg" depicting what appears to be an adult male anally penetrating what appears to be a prepubescent female minor with his erect penis. The video file is 11 seconds in duration. The second video file is titled "sm(2).mpeg", which is 5 seconds in duration, and depicts what appears to be a minor female manually masturbating while laying on her back.

b. On December 01, 2015, between 1952 and 1957 hours, one video file was downloaded from IP Address 108.39.125.218. This video file, titled "Sr5t5don(3)(2).mpeg" depicts what appears to be a minor female sitting on the ground with her legs spread open exposing her vagina, and another scene in which what appears to be a female minor preforming oral sex on a male. This video file is 24 seconds in duration.

c. On December 09, 2015, between 0304 and 0326 hours, the remaining two video files were downloaded from the aforementioned IP Address. The first, titled "11nov-26-2006 josselin 10yr.avi" is 2 minutes 49 seconds in duration, and depicts what appears to be a minor female who is apparently chatting with someone on a computer, and exposing her breasts, vagina and buttocks to a camera. The second video downloaded on that date, titled "(pthc) webcam -

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9-10y Karin from astonia 05.avi is 5 minutes 28 seconds in duration, depicting a scene in which what appears to be a nude minor female walks over to a couch and begins masturbating, and then proceeds to engage in a chat with someone on a computer while still being recorded by a camera. The minor then focuses the camera on her vagina and penetrates herself with what appears to be a blue pen.

7. On several different occasions, including most recently on July 28 and July 29, 2016, your affiant conducted physical surveillance at 932 Joshua Drive, Virginia Beach, Virginia 23462, and observed a black 2013 Hyundai Sonata bearing Virginia license plate number CT3656. Records checks showed this vehicle is registered to both Elizabeth Ashlee Carter and Jessica Marie Scott. The address this vehicle is registered to is 404 Kings Point Court, Virginia Beach, VA 23452. Records checks showed that no vehicles are registered to 932 Joshua Drive, Virginia Beach, Virginia 23462.

8. Further investigation of publicly available information showed that Carter and Jessica Marie Scott are sisters and that they have a thirty-year-old brother named BRUCE LEE SCOTT. BRUCE LEE SCOTT was convicted in North Carolina state court for indecent liberties with a minor. The offense occurred in March 2005 when the victim was 15 years old. This conviction requires him to register as a sex offender. According to the sex offender registry, BRUCE LEE SCOTT lists 932 Joshua Drive, Virginia Beach, Virginia; as his place of residence. In April 2016, a Virginia state trooper tasked with monitoring sex offender registration encountered BRUCE LEE SCOTT at the residence on Joshua Drive. Additionally, while conducting surveillance, your affiant observed Mr. SCOTT at the residence on June 10, 2016.

9. On July 29, 2016, your affiant applied for and received a search and seizure warrant from this Court for 932 Joshua Drive, Virginia Beach, VA 23462. On August 02, 2016, your affiant, along with other law enforcement officers executed the aforementioned search and seizure warrant at the address in question.

10. On the day the search was conducted, the homeowner, Jessica Scott was present at the residence and she agreed to be interviewed. She stated that her brother, BRUCE LEE SCOTT, does list 932 Joshua Drive, Virginia Beach, VA 23462 at his residence with the Virginia Sex Offender Registry, and that he has a key to doors for the converted garage, which he uses as his bedroom. Jessica Scott stated that SCOTT keeps some of his things at the house, but that he frequently stays with friends, not at 932 Joshua Drive, and that she does not keep track of his movements.

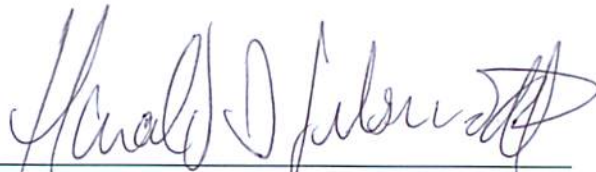
11. During the course of executing the search and seizure warrant on August 2, 2016, three laptop computers were found in the converted garage room that BRUCE LEE SCOTT uses. An on-scene forensic preview was conducted on one of these laptops, and several still image files depicting scenes of children involved in sexual activity and/or in lascivious exhibition of their genitalia were found. A number of images on the laptop were saved in user-created file folders (as opposed to software-generated file folders). Some of these images are consistent with series of child pornography that are known to law enforcement. The laptop was not manufactured in the Commonwealth of Virginia.

12. On August 4, 2016, SCOTT contacted law enforcement agents and agreed to be interviewed in person. He arranged a time to meet with agents at our offices. He also arranged

for his own transportation. He was issued Miranda warnings. In that interview, SCOTT admitted to using certain file-sharing software to receive images of child pornography using the laptop on which child pornography was found. He also admitted to ownership of that laptop.

13. Based on the information and evidence set forth above, your affiant respectfully submits that there is probable cause to believe that BRUCE LEE SCOTT has committed the following offenses: (a) between November 30, 2015 and December 09, 2015, and other occasions, in Virginia Beach, in the Eastern District of Virginia, BRUCE LEE SCOTT knowingly distributed child pornography using a means or facility of interstate or foreign commerce or that has been mailed, shipped or transported in or affecting interstate or foreign commerce, or which contains materials which have been mailed, shipped or transported, by any means including by computer, in violation of Title 18, United States Code, Section 2252A(a)(2)(B); and (b) between November 30, 2015 and December 09, 2015 and on August 2, 2016, in Virginia Beach, in the Eastern District of Virginia, BRUCE LEE SCOTT knowingly possessed material which contained child pornography that have been mailed, shipped or transported using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce, or which was produced using materials which have been mailed, shipped or transported, by any means including by computer, in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

12. Accordingly, I request that a warrant be issued authorizing the arrest of Bruce Lee SCOTT.



Harald S. Julsrud III, Special Agent
Department of Homeland Security
Homeland Security Investigations
Norfolk, VA

Sworn to before me this 5th day of August, 2016.



United States Magistrate Judge
Eastern District of Virginia

Douglas E. Miller
United States Magistrate Judge